

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOHN DOE, said name being fictitious,

Plaintiff,

v.

DELAWARE VALLEY REGIONAL HIGH SCHOOL BOARD OF EDUCATION, SCOTT MCKINNEY, individually and in his official capacity as Superintendent of Schools, ASHLEY MIRANDA, individually and in her official capacity as school counselor, MATTHEW J. PLATKIN, in his official capacity as Attorney General of the State of New Jersey, ANGELICA ALLEN-McMILLAN, in her official capacity as Acting Commissioner of the New Jersey Department of Education, and JOHN ROES 1-10 (said names being fictitious), individually and in their official capacities,

Defendants.

Civil No.

**DECLARATION OF
RONALD A. BERUTTI, ESQ.
IN SUPPORT OF APPLICATION
FOR AN ORDER TO SHOW CAUSE.**

RONALD A. BERUTTI, of full age, hereby declares the following under penalty of perjury:

1. I am a Member of Murray-Nolan Berutti LLC, attorneys for the plaintiff herein. I am fully familiar with the facts. I make this Declaration pursuant to *Fed. R. Civ. P.* 65 (b)(1)(A)-(B).

2. Attached hereto as **Exhibit A** is a copy of an email I sent to Stacey T. Cherry, Esq., attorney at Fogarty & Hara, Esqs., who I know to be representing certain members of the defendant Board of Education in a related matter.

3. Upon the filing of the Verified Complaint and all other papers supporting the application for an Order to Show Cause, I intend to email a copy of all such papers to Ms. Cherry

as well as to the Office of Attorney General to its official address for service of process, which is NJAG.ElectronicService.CivilMatters@law.njoag.gov.

4. We are seeking immediate relief for our client by Order to Show Cause since the Verified Complaint demonstrates that our client's rights have been and continue to be violated, and that the plaintiff John Doe, said name being fictitious, continues to have his fundamental constitutional right to parent his child violated by the defendants.

I hereby declare the foregoing to be true and correct based on my personal knowledge under penalty of perjury under the laws of the United States of America.

s/ Ronald A. Berutti

Ronald A. Berutti

Dated: January 5, 2024